

IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

IN RE:)	
WILLIAM A. BROWNLEE, SR.,)	CASE NO.: 24-10598-PMM
)	CHAPTER 13
DEBTOR,)	Hearing Date and Time:
)	JULY 10, 2024 at 9:30 am

MOTION FOR RELIEF FROM AUTOMATIC STAY

Eray Guven, ("Movant"), by and through his undersigned counsel, hereby request relief from the automatic stay imposed by 11 U.S.C. § 362(a) (the "Stay") to exercise their rights and remedies against real property located at 34 Centura, Cherry Hill, NJ 08003 (the "Unit"). (See copy of lease attached as Exhibit A).

1. On February 23, 2024, William A. Brownlee, Sr. ("Debtor") filed the above-captioned voluntary Chapter 13 bankruptcy petition.

2. Debtor is a tenant pursuant to a rental agreement for the Property between Movant, as landlord, and Debtor. Pursuant to the rental agreement, Debtor is obligated to pay rent each month in the amount of \$3,000.00.

4. Debtor has failed to pay rent and late fees

6. Debtor currently owes the amount of \$15,450.00.

7. Debtor's actions are causing real and irreparable harm to Movant as rent continues to accrue as Debtor continues to reside in the unit without paying any rent. Movant is continuing to be harmed by Debtor's failure to pay rent.

8. Thus, unlike traditional creditors whose debts owed by the Debtor are fixed, and no further services or goods are required to be expected or provided to the Debtor, the Movant is

obligated to continue allowing Debtor to reside in the unit rent free with no legal recourse until such time it is permitted by this Court to take appropriate action in the Justice of the Peace Court.

9. Moreover, Debtor has agreed to assume the rental agreement, however has not kept up with the ongoing rent.

WHEREFORE, Movant respectfully requests that this Honorable Court enter an Order granting immediate relief from the automatic stay and permitting Movant to exercise its rights including but not limited to seeking possession of the rental unit.

Morton, Valihura & Zerbato, LLC

/s/ Jillian M. Pratt

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Date: May 23, 2024